March 26, 1999

Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville MD 20852 6797 '99 MAR 30 A10:58

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

Dear Sir or Madam:

The FDA should retain the current labeling law, to require the terminology "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.

As a consumer, I do not wish to purchase food that has been irradiated. Irradiation can raise the level of benzene, a carcinogen, in meats, leave radiolytic products in all foods, and cause nutrient losses in fruits and vegetables. I, and other consumers who share my preferences, have a right to expect the government to protect our interest by regulations.

If the FDA were to repeal the current labeling requirement, I would be compelled to restrict my food shopping to those merchants, such as natural food stores, who do their own testing and labeling. This would cause me considerable extra expense and inconvenience.

As a Professor of Government at Suffolk University, I teach courses in public policy. I have often discussed with my students the long-term trend toward greater consumer information, which is one of the great achievements of American government. To repeal the labeling requirement for irradiated foods would be a sad reversal of this trend.

I understand that you also want comments about the type of label should be used. The label should be large enough to be readily visible to consumers, and on the front of the package, since it contains important information about the package's contents. For displayed whole foods, there should be a prominent informational display containing the irradiation information and the radura symbol.

Because food irradiation is a new technology, the public health effects of which have not been tested by long-term epidemiological studies, I believe that the FDA's labeling requirement should not be permitted to expire.

Sincerely yours,

John C. Berg

CC: Senators Kennedy, Kerry; Representative Capuano

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